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January 16, 2020

Via ECF Filing

Honorable George J. Hazel
United States District Judge
U.S. District Court for the District of Maryland
6500 Cherrywood Lane
Greenbelt, Maryland 20770

Re: *United States v. Christopher Hasson*, Criminal Case No. 19-cr-0096-GJH

Dear Judge Hazel:

Pursuant to the Sentencing Order, we are writing to provide the Court and government counsel with notice of witness testimony that we intend to present at sentencing.

We anticipate calling one witness, Dr. Stephen D. Hart, who is an internationally renowned expert in the field of risk-of-violence assessment (also known as threat assessment). Dr. Hart has worked with the FBI and numerous other government agencies, within and outside the United States, to assess perceived threats posed by individuals whose conduct raises red flags with law enforcement, as Mr. Hasson's conduct did here. Dr. Hart's complete CV is attached as Exhibit A to this letter.

In this case, Dr. Hart completed a detailed violence risk assessment of Mr. Hasson, to evaluate evidence supporting the following assertions made by the government:

- “The defendant intends to murder innocent civilians on a scale rarely seen in this country.” Dkt. No. 9, at 1.
- “The defendant is a domestic terrorist, bent on committing acts dangerous to human life that are intended to affect governmental conduct.” Dkt. No. 9, at 1.

Based on a thorough assessment of the complete factual record, Dr. Hart concluded that the government’s assertions that Mr. Hasson poses a risk of committing serious violence are unfounded. Dr. Hart summarizes his findings as follows:

It is my opinion that the evidence I reviewed does not support the government’s theory that Mr. Hasson intends (or intended) to commit acts dangerous to human life or that he is (or was) a domestic terrorist. Furthermore, it is my opinion that

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Mr. Hasson does not pose a risk of serious violence, including but not limited to murder and terrorism, either currently or in the foreseeable future.

Dr. Hart's complete report is attached as Exhibit B to this letter. Dr. Hart's anticipated testimony is summarized in detail in his report. We anticipate that his direct examination will take approximately one hour.

We encourage the Court to feel free to direct Dr. Hart's attention to any lingering questions or concerns that the Court may have about Mr. Hasson's conduct. The government has sounded very serious alarms about the potential threats posed by Mr. Hasson. Dr. Hart has given serious consideration to those concerns, and his evidence-based assessment makes clear that those fears can now be safely set aside. We truly hope that Dr. Hart's testimony will set the record straight and dispel any remaining concerns that the Court or the public may have about Mr. Hasson's plans, intentions, or actions.

We do not anticipate calling any other witnesses at this time, although this could change if anything in the government's sentencing memorandum, which we have not yet seen, requires responsive testimony. In addition, we note that some of the individuals who have written character letters to the Court (see Exhibit 8 to our sentencing memorandum) may wish to address the Court from the podium at sentencing.

Respectfully submitted,

/s/

Elizabeth G. Oyer
Cullen Macbeth

EGO:sdf

cc: Thomas Windom, AUSA
Jennifer Sykes, AUSA